

FILED
At Albuquerque NM

APR 14 2015

MATTHEW J. DYKMAN
CLERKIN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL GLOVER,

Defendant.

CRIMINAL NO. 15-1288 JHCounts 1-3: 18 U.S.C. §§ 2252(a)(2),
2252(b)(1), and 2256: Distribution of
Visual Depictions of Minors Engaged in
Sexually Explicit Conduct;Counts 4-6: 18 U.S.C. §§ 2252(a)(4)(B),
2252(b)(2), and 2256: Possession of a
Matter Containing Visual Depictions of
Minors Engaged in Sexually Explicit
Conduct.INDICTMENT

The Grand Jury charges:

Count 1

On or about May 27, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **MICHAEL GLOVER**, did knowingly distribute and attempt to distribute any visual depiction that had been mailed, shipped, or transported in and affecting interstate commerce, and which contains materials which had been so mailed, shipped, or transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(2), 2252(b)(1), and 2256.

Count 2

On or about August 11, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **MICHAEL GLOVER**, did knowingly distribute and attempt to distribute any visual

depiction that had been mailed, shipped, or transported in and affecting interstate commerce, and which contains materials which had been so mailed, shipped, or transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(2), 2252(b)(1), and 2256.

Count 3

On or about August 12, 2013, in Bernalillo County, in the District of New Mexico, the defendant, **MICHAEL GLOVER**, did knowingly distribute and attempt to distribute any visual depiction that had been mailed, shipped, or transported in and affecting interstate commerce, and which contains materials which had been so mailed, shipped, or transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(2), 2252(b)(1), and 2256.

Count 4

From on or about May 23, 2013, and continuing to on or about August 19, 2013, both dates being inclusive, in Bernalillo County, in the District of New Mexico, the defendant, **MICHAEL GLOVER**, did knowingly possess one or more matters, which contained any visual depiction that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(4)(B), 2252(b)(2), and 2256.

Count 5

From on or about July 18, 2013, and continuing to on or about August 19, 2013, both dates being inclusive, in Bernalillo County, in the District of New Mexico, the defendant, **MICHAEL GLOVER**, did knowingly possess one or more matters, which contained any visual depiction that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means including by Kindle, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(4)(B), 2252(b)(2), and 2256.

Count 6

From on or about July 21, 2013, and continuing to on or about August 19, 2013, both dates being inclusive, in Bernalillo County, in the District of New Mexico, the defendant, **MICHAEL GLOVER**, did knowingly possess one or more matters, which contained any visual depiction that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means including by flash/thumb-drive, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(4)(B), 2252(b)(2), and 2256.


FORFEITURE ALLEGATIONS

Upon conviction of any offense alleged in this Indictment, Defendant **MICHAEL GLOVER** shall forfeit to the United States pursuant to 18 U.S.C. §§ 2252(a)(4)(B), 2252(b)(2), and 2256:

- A. Gateway Laptop Computer, S/N NXYIUAA030311116EC3400;
- B. SanDisk Cruzer Glide 8 Gigabyte USB/flash/thumb-drive, S/N SDZ60-008G-BI12052346B; and
- C. Amazon Kindle Fire 5 Gigabyte, Model Number D01400

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY



Assistant United States Attorney

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